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Plaintiff, *Pro Se*

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JEFFREY W. TAM,

Plaintiff,

v.

JOHN E. POTTER,

Defendant.

No. 07-2747 SI

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINES
FOR EXPERT DISCOVERY**

The parties stipulate as follows:

1. On March 18, 2008, the Court granted plaintiff permission to file a Second Amended Complaint to allege that defendant has “created mental stress for the plaintiff.”
2. Pursuant to the Court’s September 10, 2007 Case Management Order, the deadline for designation of experts is currently set for May 1, 2008. The expert discovery cut-off is May 30, 2008.

3. Plaintiff has agreed to an independent psychological examination, and the parties are currently in the process of finding a mutually convenient date for the examination. To allow time for the parties to find a convenient date for the examination and time for the completion of a report following the examination, the parties respectfully stipulate to extend the expert discovery deadlines as follows:

Expert Disclosure: May 21, 2008

Expert Discovery Cut-Off: June 30, 2008

IT IS SO STIPULATED.

DATED: March 27, 2008

Respectfully submitted,

/s/
JEFFREY W. TAM
Plaintiff, *Pro Se*

DATED: March 31, 2008

JOSEPH P. RUSSONIELLO
United States Attorney


/s/
JENNIFER S WANG
Assistant United States Attorney

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause having been shown, it is ordered that:

1. The deadline for expert disclosures is extended to May 21, 2008;
2. All discovery from experts must be completed by June 30, 2008.

DATED: _____


SUSAN ILLSTON
United States District Court Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of the Office of the United States Attorney for the Northern District of California and is a person of such age and discretion to be competent to serve papers. The undersigned further certifies that she is causing a copy of the following:

**STIPULATION AND [PROPOSED] ORDER TO EXTEND
DEADLINES FOR EXPERT DISCOVERY**

Jeffrey W. Tam v. John E. Potter
Case No. CV 07-2747 JCS

to be served this date upon the party in this action by placing a true copy thereof in a sealed envelope, and served as follows:

X **FIRST CLASS MAIL** by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing U.S. mail in accordance with this office's practice.
 CERTIFIED MAIL (#) by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing U.S. mail in accordance with this office's practice.
 ELECTRONIC MAIL
 FEDERAL EXPRESS
 FACSIMILE (FAX) Telephone No.: See Below

to the party(ies) addressed as follows:

Jeffrey W Tam
408 Yorkshire Road
Alameda, CA 94501
(510) 522-5534
PRO SE

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on March 31, 2008 at San Francisco, California.

/s/
BONNY WONG
Legal Assistant